

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

vs.

NO. 1:21-cv-780-XR

JOHN SCOTT, et al.,

Defendants.

HOUSTON JUSTICE, et al.

Plaintiffs,

vs.

NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et al.

Defendants.

LULAC TEXAS, et al.

Plaintiffs,

vs.

NO. 1:21-cv-786-XR

JOHN SCOTT, et al.

Defendants.

MI FAMILIA VOTA, et al.

Plaintiffs,

vs.

NO. 5:21-cv-0920-XR

GREG ABBOTT, et al.

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. 5:21-cv-1085-XR

THE STATE OF TEXAS, et al.

Defendants.

**DISTRICT ATTORNEY OGG'S OBJECTIONS TO
HAUL AND MFV PLAINTIFFS' EXHIBIT LIST**

EXHIBIT A**Exhibit List**

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 1	6/4/2021	87th Texas Legislative Session: What Happened with Voting Bills	FRE 801 et seq.	-	
HAUL-MFV 2	3/22/2021	ACLU of Texas Letter to Texas Senate State Affairs Committee re Public Hearing on Senate Bill 7	FRE 801 et seq.		
HAUL-MFV 3	3/25/2021	ADL Letter re HB 6, Relating to election integrity and preservation of the purity of the ballot box through prevention of fraud in the conduct of an election; increasing criminal penalties; creating criminal offenses	FRE 801 et seq.		
HAUL-MFV 4	3/24/2021	ADL Letter re HB 6, Relating to election integrity and preservation of the purity of the ballot box through prevention of fraud in the conduct of an election; increasing criminal penalties; creating criminal offenses	FRE 801 et seq.		
HAUL-MFV 5	3/26/2021	ADL Letter to Texas Senate State Affairs Committee re SB 7, relating to elections, including election integrity and security; creating a criminal offense; providing civil penalties - OPPOSE	FRE 801 et seq.		
HAUL-MFV 6	3/26/2021	ADL Letter to Texas Senate State Affairs Committee re SB 7, relating to elections, including election integrity and security; creating a criminal offense; providing civil penalties - OPPOSE	FRE 801 et seq.		
HAUL-MFV 7	4/6/2022	Article: More than 12% of mail-in ballots were rejected in Texas under new GOP voting rules, final tally shows, Houston Chronicle	FRE 801 et seq.		
HAUL-MFV 8	4/6/2022	Article: Nearly 25,000 mail ballots were rejected in Texas primaries, fueled by confusion over new restrictions, Houston Chronicle	FRE 801 et seq.		
HAUL-MFV 9		Bexar County Elections Department webpage re voters with disabilities			
HAUL-MFV 10	3/29/2022	Black Ballot Rejection Rates, power point slides			
HAUL-MFV 11		Complaint-cancelled curbside voting due to inclement weather	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 12	3/10/2020	Complaint--describes election judge who had "a real problem with voters with disabilities" who indicated to staff that "we are doing too much for these voters" when helping them vote curbside.	FRE 801 et seq.		
HAUL-MFV 13	10/25/2020	Complaint--pollworker describes that people with significant disabilities including one voter who required oxygen had to wait 30 minutes or more to have their absentee ballot cancelled so they could vote curbside	FRE 801 et seq.		
HAUL-MFV 14	10/14/2020	Complaint--voter directed to go inside instead of using curbside voting because it would be easier for staff	FRE 801 et seq.		
HAUL-MFV 15	10/14/2020	Complaint--waited for curbside voting for 2.5 hours in the parking lot	FRE 801 et seq.		
HAUL-MFV 16	8/23/2021	Courtney Pugh's Testimony to the House Constitutional Rights & Remedies Against SB 1	FRE 602, 701, 801 et seq.		
HAUL-MFV 17		Dallas County Elections Department webpage Re Voters with disabilities			
HAUL-MFV 18	8/23/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas House Select Committee on Constitutional Rights and Remedies on Senate Bill 1	FRE 602, 701, 801 et seq.		
HAUL-MFV 19	4/1/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas State Affairs Committee	FRE 602, 701, 801 et seq.		
HAUL-MFV 20	7/10/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas State Affairs Committee on Senate Bill 1	FRE 602, 701, 801 et seq.		
HAUL-MFV 21	3/19/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas State Affairs Committee on Senate Bill 1509	FRE 602, 701, 801 et seq.		
HAUL-MFV 22	6/21/2023	Declaration of Amy Litzinger	FRE 602, 701, 801 et seq.		
HAUL-MFV 23	6/18/2023	Declaration of Anne Scott	FRE 602, 701, 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 24	6/16/2023	Declaration of Bob Kafka	FRE 602, 701, 801 et. seq.		
HAUL-MFV 25	6/23/2023	Declaration of Dr. Kara Ayers	FRE 602, 701, 801 et. seq.		
HAUL-MFV 26	6/22/2023	Declaration of Heisha Freeman	FRE 602, 701, 801 et. seq.		
HAUL-MFV 27	6/22/2023	Declaration of Jeffrey Clemmons	FRE 602, 701, 801 et. seq.		
HAUL-MFV 28	6/20/2023	Declaration of Jennifer Martinez	FRE 602, 701, 801 et. seq.		
HAUL-MFV 29	6/20/2023	Declaration of Jennifer Miller	FRE 602, 701, 801 et. seq.		
HAUL-MFV 30	6/22/2023	Declaration of Jodi Lydia Nunez Landry	FRE 602, 701, 801 et. seq.		
HAUL-MFV 31	5/24/2023	Declaration of Laura Halvorson	FRE 602, 701, 801 et. seq.		
HAUL-MFV 32	6/23/2023	Declaration of Marc Spier	FRE 602, 701, 801 et. seq.		
HAUL-MFV 33	6/21/2023	Declaration of Nancy Crowther	FRE 602, 701, 801 et. seq.		
HAUL-MFV 34	6/18/2023	Declaration of Taylor Scott	FRE 602, 701, 801 et. seq.		
HAUL-MFV 35	5/1/2023	Declaration of Terri Saltzman	FRE 602, 701, 801 et. seq.		
HAUL-MFV 36	6/22/2023	Declaration of Yolanda Ross	FRE 602, 701, 801 et. seq.		
HAUL-MFV 37	5/12/2023	Declaration of Yvonne Iglesias	FRE 602, 701, 801 et. seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 38	5/5/2023	Defendant Harris County Elections Administrator, Clifford Tatum's Amended Responses and Objections to LULAC Plaintiffs' Third Set of Interrogatories			
HAUL-MFV 39	3/21/2023	Defendant Ogg's First Amended Responses to OCA-GH's Second Set of Interrogatories			
HAUL-MFV 40	3/17/2023	Defendant Ogg's Responses to LULAC Plaintiffs' Discovery Requests			
HAUL-MFV 41		Draft info bulletin on SB 1 changes to mail-in voting intended for the public	FRE 801 et seq.		
HAUL-MFV 42		El Paso County Voters with Special Needs webpage re voters with disabilities			
HAUL-MFV 43		Election Assistance Commission – CARES Grant Funding Chart - July 22nd 2020, https://www.eac.gov/sites/default/files/paymentgrants/cares/FundingChart_CARES.pdf (last visited Feb. 10, 2022):	FRE 801 et seq.		
HAUL-MFV 44	5/26/2021	Email from Anthony Gutierrez to Rep. Briscoe Cain re Letter in opposition to SB7 from voting rights advocacy organizatinos	FRE 801 et seq.		
HAUL-MFV 45	1/17/2022	E-mail from REVUP to advocacy community regarding mail-in-votes rejected with information to help eligible mail ballot voters navigate SB 1	FRE 801 et seq.		
HAUL-MFV 46	3/9/2022	E-mail from REVUP to community advocate making recommendations on SB 1 educational PowerPoint	FRE 801 et seq.		
HAUL-MFV 47		Emily Eby and Joaquin Gonzalez, Opening the Floodgates for Racial Intimidation, Disenfranchisement, and Violence by Expanding Poll Watcher Authority. Texas Civil Rights Project	FRE 801 et seq.		
HAUL-MFV 48		Episode 9 of REVUP podcast	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 49		Excerpts from Harris County Call Log			
HAUL-MFV 50		Exhibit 2 to Ann Scott Deposition (OCA Greater Houston and HAUL Plaintiffs' Sixth Supplemental Initial Disclosures)	FRCP 33		
HAUL-MFV 51		Exhibit 2 to Bob Kafka Declaration (Plaintiffs' OCA Second Amended Complaint)	FRCP 33		
HAUL-MFV 52		Exhibit 2 to Catherine Cranston Deposition (Third Supplemental Disclosures)	FRCP 33		
HAUL-MFV 53		Exhibit 2 to Daniel Hayes Deposition (SB 1)			
HAUL-MFV 54		Exhibit 2 to Nancy Crowther Deposition (SB 1)			
HAUL-MFV 55		Exhibit 2 to Toby Cole Deposition (SB 1)			
HAUL-MFV 56		Exhibit 2 to Yvonne Iglesias Deposition (OCA Greater Houston and HAUL Plaintiffs' Sixth Supplemental Initial Disclosures)	FRCP 33		
HAUL-MFV 57		Exhibit 3 to Catherine Cranston Deposition (Second Supplemental Disclosures)	FRCP 33		
HAUL-MFV 58		Exhibit 7 to Catherine Cranston Deposition (SB 1)			
HAUL-MFV 59	2/28/2022	Expert Report by Franita Tolson	FRE 702, 801 et seq.		
HAUL-MFV 60	4/29/2022	Expert Report of Daniel A. Smith, Ph.D.	FRE 702, 801 et seq.		
HAUL-MFV 61		Expert Report of Dr. Kara Ayers Regarding the Impact of Senate Bill 1's Revised Oath on Texas Voters with Disabilities	FRE 702, 801 et seq.		
HAUL-MFV 62	2/28/2022	Expert Report of Professor Douglas L. Kruse, Ph.D.	FRE 702, 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 63	11/2/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 64	9/26/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 65	7/16/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 66	10/26/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 67	12/15/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 68	9/16/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 69	9/13/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 70	5/11/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 71	7/6/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 72	5/6/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 73	9/7/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 74	9/15/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 75	4/1/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 76	8/9/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 77	5/25/2021	Facebook Post	FRE 901, 801 et seq.	—	

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 78	10/18/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 79	5/5/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 80	12/13/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 81	9/7/2021	Facebook Post	FRE 901, 801 et seq.	—	
HAUL-MFV 82		Facebook posts	FRE 901, 801 et seq.	—	
HAUL-MFV 83		Facebook posts	FRE 901, 801 et seq.		
HAUL-MFV 84		Facebook posts	FRE 901, 801 et seq.		
HAUL-MFV 85		Facebook posts	FRE 901, 801 et seq.		
HAUL-MFV 86		Facebook posts	FRE 901, 801 et seq.	—	
HAUL-MFV 87		Facebook posts	FRE 901, 801 et seq.		
HAUL-MFV 88		Facebook posts	FRE 901, 801 et seq.		
HAUL-MFV 89	7/1/2022	Form 7-58 Oath of Assistance			
HAUL-MFV 90		Grant Summary to Harris County webpage			
HAUL-MFV 91		Harris County Call Log			
HAUL-MFV 92		Harris County Carrier Envelope Insert for November 2022 General Election			

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 116	2021	Dallas County Single Audit Reports for the Year Ended September 30, 2021			
HAUL-MFV 117	2023	Dallas County, Texas Single Audit Reports for the Year Ended September 30, 2022			
HAUL-MFV 118	2021	El Paso County FY 2021 Adopted Budget			
HAUL-MFV 119	2022	El Paso County 2022 Adopted Budget			
HAUL-MFV 120	2022	Travis County Fiscal Year 2022 Adopted Budget			
HAUL-MFV 121		Jane's Due Process Opposes SB 7 As an Attack on Voting Rights	FRE 801 et seq.		
HAUL-MFV 122	9/7/2021	Lawsuit Filed Challenging New Texas Law Targeting Voting Rights	FRE 801 et seq.		
HAUL-MFV 123	4/1/2021	LDF Letter to House Elections Committee re LDF Opposition to House Bill 6	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 124	3/26/2021	LDF Letter to Senate State Affairs Committee re LDF Opposition to Senate Bill 7	FRE 801 et seq.		
HAUL-MFV 125	3/22/2021	LDF Letter to Senate State Affairs Committee re LDF Opposition to Senate Bill 7	FRE 801 et seq.		
HAUL-MFV 126	3/25/2021	League of United Latin American Citizens Opposes Voter Suppression Legislation	FRE 801 et seq.		
HAUL-MFV 127		Legislative Update	FRE 801 et seq.		
HAUL-MFV 128	3/22/2021	Letter from ACLU of Texas, et al. to House Elections Committee	FRE 801 et seq.		
HAUL-MFV 129	5/11/2021	Letter from Dallas Black Clergy for Safety Equity and Justice, et al. to Governor Abbott, Lieutenant Governor Patrick, Speaker Phelan, and all the Members of the Texas State Legislature	FRE 801 et seq.		
HAUL-MFV 130		Letter from Devin Branch, Harris County Political Organizer, Texas Organizing Project, re Senate Bill 7	FRE 801 et seq.		
HAUL-MFV 131	3/26/2021	Letter from Georgia Keysor re Senate Bill 7	FRE 801 et seq.		
HAUL-MFV 132	5/5/2021	Letter from Isabel Longoria to Office of Texas State Representative A. Johnson	FRE 801 et seq.		
HAUL-MFV 133	5/14/2020	Letter from Ruth R. Hughes, Texas Secretary of State, to Mona Harrington, Acting Exec. Dir., U.S. Election Assistance Commission, dated May 14, 2020			
HAUL-MFV 134	3/26/2021	Letter from Wesley Story, Progress Texas	FRE 801 et seq.		
HAUL-MFV 135	5/3/2021	Letter in opposition to bills criminalizing voting activities from National and Texas voting rights and criminal justice organizations	FRE 801 et seq.		
HAUL-MFV 136	8/23/2021	Letter re SB 1, "election integrity" - Opposition Testimony by Public Citizen	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 137		Mass media e-mail concerning "ripple effect" of SB 1 on voting, including mail in voting for persons with disabilities	— FRE 801 et seq.	—	
HAUL-MFV 138		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 139		Media outreach and inquiries	— FRE 801 et seq.		
HAUL-MFV 140		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 141		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 142		Media outreach and inquiries	— FRE 801 et seq.		
HAUL-MFV 143		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 144		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 145		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 146		Media outreach and inquiries	— FRE 801 et seq.	—	
HAUL-MFV 147		Media outreach	— FRE 801 et seq.	—	
HAUL-MFV 148		Media outreach	— FRE 801 et seq.	—	
HAUL-MFV 149		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 150		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 151		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 152		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 153		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 154		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 155		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 156		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 157		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 158		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 159		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 160		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 161		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 162		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 163		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 164		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 165		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	—		
HAUL-MFV 166		National Disability Voter Registration Week Resources	FRE 801 et seq.	—	

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 167	4/6/2021	Press Conference Hosted by Lieutenant Governor Dan Patrick, Certified Transcript			
HAUL-MFV 168		Press release regarding the power of the disability vote in the wake of SB 1	FRE 801 et seq.		
HAUL-MFV 169	8/23/2021	Q's for Courtney Pugh Re: Invited testimony against SB1			
HAUL-MFV 170	3/30/2021	Re: First Draft Legislative Update			
HAUL-MFV 171	4/1/2023	Rep. Bucy comments from April 1, 2023, House Elections Committee Hearing			
HAUL-MFV 172		REVUP Facebook posts	FRE 801 et seq.		
HAUL-MFV 173		REVUP Facebook posts	FRE 801 et seq.		
HAUL-MFV 174	7/10/2021	SB 1 Senate Committee on State Affairs, Certified Transcript			
HAUL-MFV 175	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 1, Certified Transcript			
HAUL-MFV 176	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 1, Certified Transcript			
HAUL-MFV 177	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 2, Certified Transcript			
HAUL-MFV 178	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 2, Certified Transcript			
HAUL-MFV 179	8/26/2021	SB1 House Floor Debate, Certified Transcript			
HAUL-MFV 180	8/11/2021	SB1 Senate Floor Debate Part 1, Certified Transcript			

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 181	8/11/2021	SB1 Senate Floor Debate Part 2, Certified Transcript			
HAUL-MFV 182	7/11/2021	Senate Committee on State Affairs Hearing on SB1, Certified Transcript			
HAUL-MFV 183	3/26/2021	Senate Committee on State Affairs, Certified Transcript			
HAUL-MFV 184	8/31/2021	Senate Floor Debate and Adoption of SB1 CCR, Certified Transcript			
HAUL-MFV 185	7/13/2021	Senate Floor Debate on SB1, Certified Transcript			
HAUL-MFV 186	7/13/2021	Senate Floor Debate on SB1, Certified Transcript			
HAUL-MFV 187	3/31/2021	Senate Floor Debate Part III, Certified Transcript			
HAUL-MFV 188	3/31/2021	Senate Floor Debate Part III, Certified Transcript			
HAUL-MFV 189	3/22/2021	Senate State Affairs Committee Hearing, Certified Transcript			
HAUL-MFV 190	3/22/2021	Senate State Affairs Committee Hearing, Certified Transcript			
HAUL-MFV 191	5/5/2023	Signed Verification of Answers to LULAC Plaintiffs' Third Set of Interrogatories and OCA Plaintiffs' First Set of Interrogatories			
HAUL-MFV 192		Supplemental Declaration of Deborah Chen	FRE 602, 701, 801 et. seq.		
HAUL-MFV 193		Supplemental Declaration of Joyce LeBombard	FRE 602, 701, 801 et. seq.		
HAUL-MFV 194	3/1/2022	Survey Bastrop County 2022 Election Inspector Report			
HAUL-MFV 195	3/1/2022	Survey Blanco County 2022 Election Inspector Report			

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 211	3/1/2022	Survey Williamson County 2022 Election Inspector Report			
HAUL-MFV 212	4/18/2022	Harris County Poll Workers Survey about voters with disabilities	FRE 801 et seq.		
HAUL-MFV 213	3/26/2021	Testimony by Ginger Mayeaux Before the House Elections Committee	FRE 602, 701, 801 et seq.		
HAUL-MFV 214	3/22/2021	Testimony by Ginger Mayeaux Before the Senate State Affairs	FRE 602, 701, 801 et seq.		
HAUL-MFV 215		Testimony from Luis, Every Texan, in Opposition to SB 1: Related to Election Integrity and Security	FRE 602, 701, 801 et seq.		
HAUL-MFV 216	7/10/2021	Testimony of Alex Cogan, LMSW, Manager of Public Policy and Advocacy, The Arc of Texas, Senate State Affairs Committee, Regarding SB 1	FRE 602, 701, 801 et seq.		
HAUL-MFV 217		Testimony of Anne Robinson	FRE 602, 701, 801 et seq.		
HAUL-MFV 218		Testimony of Maggie Stern, Children's Defense Fund on HB6	FRE 602, 701, 801 et seq.		
HAUL-MFV 219	4/1/2021	Testimony of Nina Perales, MALDEF Vice President of Litigation, on House Bill 6, Texas House Committee on Elections	FRE 602, 701, 801 et seq.		
HAUL-MFV 220	3/26/2021	Testimony of Nina Perales, MALDEF Vice President of Litigation, on Senate Bill 7, Texas Senate Committee on State Affairs	FRE 602, 701, 801 et seq.		
HAUL-MFV 221	7/10/2021	Testimony of Nina Perales, MALDEF Vice President of Litigation, on Senate Bills 1 and 31, Texas Senate Committee on State Affairs	FRE 602, 701, 801 et seq.		
HAUL-MFV 222		Testimony of Patty Ducayet	FRE 602, 701, 801 et seq.		
HAUL-MFV 223		Testimony of Ruei Tuo, 87th - 1st Special Session - Texas Bill SB1/HB3	FRE 602, 701, 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 224	3/26/2021	Testimony of Stephanie Gomez on behalf of Common Cause Texas in Opposition to Senate Bill 7	FRE 602, 701, 801 et seq.		
HAUL-MFV 225	7/10/2021	Testimony on SB 1, by Emily Eby, Staff Attorney, Texas Civil Rights Project, Texas Senate State Affairs Committee	FRE 602, 701, 801 et seq.		
HAUL-MFV 226	8/23/2021	Testimony on SB 1, By James Slattery, Senior Staff Attorney, Texas Civil Rights Project, Texas House Select Committee on Constitutional Rights & Remedies	FRE 602, 701, 801 et seq.		
HAUL-MFV 227	3/26/2021	Testimony on SB 7, Proposed Legislation relating to elections, including election integrity and security by Emily Eby, Staff Attorney, Texas Civil Rights Project, before the Texas Senate State Affairs Committee	FRE 602, 701, 801 et seq.		
HAUL-MFV 228	3/26/2021	Testimony on SB 7, Proposed Legislation relating to elections, including election integrity and security; creating criminal offense; providing civil penalties by James Slattery, Senior Staff Attorney, Texas Civil Rights Project, before the Texas Senate State Affairs Committee	FRE 602, 701, 801 et seq.		
HAUL-MFV 229	8/9/2021	Testimony to the Senate Affairs Committee Against SB1, Courtney Pugh, Member of the Arc of Texas	FRE 602, 701, 801 et seq.		
HAUL-MFV 230		Texas Legislative Online History for SB1			
HAUL-MFV 231		Texas Legislature Second Special Session: SB 1 Infringes on Voting Rights of Texas with Disabilities	FRE 801 et seq.		
HAUL-MFV 232		Texas Legislature Second Special Session: SB 1 Makes it Difficult for Texans with Disabilities to Vote	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 233		Texas Secretary of State, Help America Vote Act (HAVA) Update, Texas Association of Counties Legislative Conference (Aug. 27, 2020), https://www.sos.texas.gov/elections/forms/hava/HAVAggrant-presentation-TAC-8272020-update.pdf			
HAUL-MFV 234		The Arc of Texas Provides Testimony Against Senate Bill on Elections	FRE 801 et seq.	—	
HAUL-MFV 235	3/25/2021	Transcript of the Testimony of HB6 House Elections Committee			
HAUL-MFV 236		Travis County Voters with Disabilities webpage			
HAUL-MFV 237	10/8/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 238	10/26/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 239	12/15/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 240	9/7/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 241	9/8/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 242	9/8/2021	Tweet	FRE 901, 801 et seq.		
HAUL-MFV 243	9/9/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 244	9/13/2021	Tweet	FRE 901, 801 et seq.		
HAUL-MFV 245	9/15/2021	Tweet	FRE 901, 801 et seq.		
HAUL-MFV 246	10/3/2021	Tweet	FRE 901, 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 247	9/28/2021	Tweet	FRE 901, 801 et seq.		
HAUL-MFV 248	9/7/2021	Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 249		Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 250		Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 251		Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 252		Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 253		Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 254		Tweet	FRE 901, 801 et seq.	—	
HAUL-MFV 255		Video clip via YouTube: “Disability Voters Mobilize for May Vote & Chilling Laws’ w/ Bob Kafka, Rev-Up TX, KPFT News 3/25/255”	FRE 801 et seq.	—	
HAUL-MFV 256	4/5/2021	Voting bills make their way through Texas Senate, House	FRE 801 et seq.	—	
HAUL-MFV 257	3/1/2022	State voter letter 6-19	FRE 801 et seq.		
HAUL-MFV 258	7/1/2022	State voter form 7-58	FRE 801 et seq.		
HAUL-MFV 259	7/15/2021	Why Did Texas House Democrats (and some Senators) leave Austin? Here's what to know	FRE 801 et seq.	—	
HAUL-MFV 260	4/1/2021	Written Testimony of Jeffrey Clemmons on HB6	FRE 602, 701, 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 261	8/11/2021	SB1 Senate Floor Debate Part 1, Certified Transcript			
HAUL-MFV 262	8/11/2021	SB1 Senate Floor Debate Part 2, Certified Transcript			
HAUL-MFV 263	8/9/2021	SB1 Senate State Affairs Committee Hearing Part 1, Certified Transcript			
HAUL-MFV 264	8/9/2021	SB1 Senate State Affairs Committee Hearing Part 2, Certified Transcript			
HAUL-MFV 265	4/1/2021	Ex. 6 to Cain Deposition - Testimony in Opposition, Texas Civil Rights Project	FRE 602, 701, 801 et seq.		
HAUL-MFV 266		Ex. 10 to Cain Deposition - Conference Committee Report Form	FRE 801 et seq.		
HAUL-MFV 267		Ex. 12 to Cain Deposition - Tweet			
HAUL-MFV 268	1/1/2022	Poll Watcher's Guide, Issued by Secretary of State Elections Division			
HAUL-MFV 269	8/9/2021	Testimony on SB1, by Emily Eby, Staff Attorney, Texas Civil Rights Project, Texas Senate State Affairs Committee	FRE 602, 701, 801 et seq.		
HAUL-MFV 270	8/9/2021	Testimony of Alex Cogan, LMSW, Manager of Public Policy and Advocacy, The Arc of Texas, Senate State Affairs Committee, Regarding SB 1	FRE 602, 701, 801 et seq.		
HAUL-MFV 271	7/10/2021	Testimony of Alex Cogan, LMSW, Manager of Public Policy and Advocacy, The Arc of Texas, House Select Committee Constitutional Rights and Remedies, Regarding HB 3	FRE 602, 701, 801 et seq.		
HAUL-MFV 272	5/1/2021	Braking the Status Quo: Drive Thru Voting and the 2020 General Election in Harris County	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 273	5/6/2021	Letters from Isabel Longoria to State Senators Alvarado, Bettencourt, Creighton, Huffman, Kolkhorst, Miles, Taylor, Whitmire re Impacts of Senate Bill 7 and House Bill 6 on Harris County Voters	FRE 801 et seq.		
HAUL-MFV 274	5/5/2021	Letters from Isabel Longoria to State Representatives re Impacts of Senate Bill 7 and House Bill 6 on Harris County Voters	FRE 801 et seq.		
HAUL-MFV 275		Voting Integrity & Security Collaborative Task Force			
HAUL-MFV 276		Letter from Anne Robinson, US Army Captain Retired, Paralyzed Veterans of America, to Senator Powell re Disabled Voter Access - SB1 and HB3	FRE 801 et seq.		
HAUL-MFV 277	1/28/2022	Election Advisory No. 2022-08, Office of the Secretary of State, re NEW LAW: Senate Bill 1 - Opportunity to Correct Defects on an Application for Ballot by Mail and Carrier Envelope			
HAUL-MFV 278		Texas Civil Rights Project testimony on SB 1	FRE 602, 701, 801 et seq.		
HAUL-MFV 279		Letter from Dem Caucus re SB 7			
HAUL-MFV 280		Texas Civil Rights Project testimony on SB 7	FRE 602, 701, 801 et seq.		
HAUL-MFV 281		"The False narrative of Vote-by-Mail Fraud," by the Brennan Center	FRE 801 et seq.		
HAUL-MFV 282	7/1/2021	Letter from TX Association of Election Administrators	FRE 801 et seq.		
HAUL-MFV 283		Testimony re SB 1 by Texas Civil Rights Project	FRE 602, 701, 801 et seq.		
HAUL-MFV 284		Copy of SB 1			

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 304	5/1/2022	Article: Jasper Scherer and Zach Despart, "GOP bills target Harris County's efforts to expand voting. Here's how that played out in the 2020 election," Houston Chronicle, May 1, 2021, https://www.houstonchronicle.com/news/houston-texas/houston/article/GOP-bills-target-Harris-County-s-efforts-to-16143213.php .	FRE 801 et seq.		
HAUL-MFV 305	12/21/2020	Article: Taylor Goldenstein, "Ken Paxton's beefed-up 2020 voter fraud unit closed 16 minor cases, all in Harris County," Houston Chronicle, Dec. 21, 2020, https://www.houstonchronicle.com/politics/texas/article/politics/texas/article/Ken-Paxton-s-beefed-up-2020-voterfraud-unit-15820210.php .	FRE 801 et seq.		
HAUL-MFV 306	12/17/2021	Article: Taylor Goldenstein, "Texas AG Paxton's \$2.2M voter fraud unit closed three cases in 2021. GOP lawmakers still boosted its budget," Houston Chronicle, Dec. 17, 2021, https://www.houstonchronicle.com/politics/texas/article/Texas-AG-Paxton-s-2-2M-voter-fraud-unit-closed-16708051.php .	FRE 801 et seq.		
HAUL-MFV 307	4/12/2021	Article: Taylor Goldenstein, "Fact checking Texas lawmaker's claim of 400 voter fraud 'cases'," Houston Chronicle, April 12, 2021, https://www.houstonchronicle.com/politics/texas/article/Fact-checking-Texas-lawmaker-s-claim-of-400-16095858.php .	FRE 801 et seq.		

Exhibit No.	Doc Date	Description	Objections		
HAUL-MFV 308	3/24/2021	“Voters of Color Appear to Be Most Frequent Targets of Attorney General Ken Paxton’s Election Integrity Unit,” Press Release, March 24, 2021, https://www.aclutx.org/en/press-releases/voters-color-appear-be-most-frequent-targets-attorney-general-ken-paxtons-election .	FRE 801 et seq.		
HAUL-MFV 309		Commonwealth Fund 2020 Scorecard on State Health System Performance, https://www.commonwealthfund.org/publications/scorecard/2020/sep/2020-scorecard-state-health-system-performance .	FRE 801 et seq.		
HAUL-MFV 310	5/13/2022	First Expert Report (corrected) by Daniel A. Smith, Ph. D.	FRE 702, 801 et seq.		
HAUL-MFV 311	6/7/2023	Third Supplemental Expert Report by Daniel A. Smith, Ph.D.	FRE 702, 801 et seq.		
HAUL-MFV 312	5/22/2023	Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his Third Supplemental Expert Report (6/7/2023)	FRE 702, 801 et seq.		
HAUL-MFV 313	3/20/2023	Second Supplemental Expert Report of Daniel A. Smith, Ph.D.	FRE 702, 801 et seq.		
HAUL-MFV 314		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Supplemental Report (3/20/2023) - re: Travis County	FRE 801 et seq.		
HAUL-MFV 315		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Supplemental Expert Report (3/20/2023) - re: Travis County	FRE 801 et seq.		
HAUL-MFV 316		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) re: Harris County	FRE 702, 801 et seq.		
HAUL-MFV 317		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Harris County	FRE 702, 801 et seq.		

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HAUL-MFV 318	4/26/2022	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) re: Harris County	FRE 801 et seq.		
HAUL-MFV 319		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Tarrant County	FRE 801 et seq.		
HAUL-MFV 320		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	FRE 801 et seq.		
HAUL-MFV 321		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	FRE 801 et seq.		
HAUL-MFV 322		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	FRE 801 et seq.		
HAUL-MFV 323	4/26/2022	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	FRE 801 et seq.		
HAUL-MFV 324		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Hidalgo County	FRE 801 et seq.		
HAUL-MFV 325		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: El Paso County	FRE 801 et seq.		
HAUL-MFV 326	2/2/2023	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: Harris County	FRE 702, 801 et seq.		
HAUL-MFV 327	2/2/2023	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: Harris County	FRE 702, 801 et seq.		
HAUL-MFV 328	2/2/2023	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: Harris County	FRE 702, 801 et seq.		

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HAUL-MFV 329		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: statewide	FRE 702, 801 et seq.		
HAUL-MFV 330		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Expert Report (4/22/2023)	FRE 702, 801 et seq.		
HAUL-MFV 331		Reliance material provided to Expert Daniel A. Smith, Ph.D. for each of his reports	FRE 702, 801 et seq.		
HAUL-MFV 332	2/28/2022	Expert Report of J. Morgan Kousser, Ph.D.	FRE 702, 801 et seq.		
HAUL-MFV 333	2/28/2022	Eric McDaniel Expert Witness report	FRE 702, 801 et seq.		
HAUL-MFV 334	2/28/2022 McDaniel report	Figure One: Racial differences in voting methods given age	FRE 702, 801 et seq.		
HAUL-MFV 335	2/28/2022 McDaniel report	Figure Two: Predicted probability of using a voting method, given race and age in 2020 election	FRE 702, 801 et seq.		
HAUL-MFV 336	2/28/2022 McDaniel report	Figure Three: Predicted probability of using a voting method, given race and age in 2016 election	FRE 702, 801 et seq.		
HAUL-MFV 337	2/28/2022 McDaniel report	Figure Four: Wait times for in-person voting by race and voting method	FRE 702, 801 et seq.		
HAUL-MFV 338	2/28/2022 McDaniel report	Figure Five: Predicted probability of reported wait time given race and voting method	FRE 702, 801 et seq.		
HAUL-MFV 339	2/28/2022 McDaniel report	Figure Seven: Racial differences in ballot drop location	FRE 702, 801 et seq.		
HAUL-MFV 340	2/28/2022 McDaniel report	Figure Eight: Wait time for in-person voting by county size	FRE 702, 801 et seq.		
HAUL-MFV 341	2/28/2022 McDaniel report	Table One: percentage of state population by in counties by county size and race	FRE 702, 801 et seq.		
HAUL-MFV 342	2/28/2022 McDaniel report	Figure Nine: Reported incidents of voter intimidation given a county's history of lynching and President Trump's margin of victory	FRE 702, 801 et seq.		
HAUL-MFV 343	4/29/2022	Eric McDaniel Supplemental Expert Witness Report	FRE 702, 801 et seq.		

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HAUL-MFV 344	4/29/2022 McDaniel supp. report	Figure One: Texas voter turnout 2000-2020 by race	FRE 702, 801 et seq.		
HAUL-MFV 345	2/10/2023	Eric McDaniel Supplemental Expert Witness Report	FRE 702, 801 et seq.		
HAUL-MFV 346	2/10/2023 McDaniel supp. report	Figure One: Average change in county level in-person and mail early voting 2016-2022	FRE 702, 801 et seq.		
HAUL-MFV 347	2/28/2022	Expert Report of Christian Grose	FRE 702, 801 et seq.		
HAUL-MFV 348	2/28/2022 Grose report	Table 4: The empirical racial impact of banning 24-hour early voting in Texas	FRE 702, 801 et seq.		
HAUL-MFV 349	2/28/2022 Grose report	Table 5 (page 19): Average share of the vote-by-mail electorate across Texas counties	FRE 702, 801 et seq.		
HAUL-MFV 350	4/25/2022	Rebuttal expert report of Dr. Christian Grose	FRE 702, 801 et seq.		
HAUL-MFV 351	4/25/2022 Grose rebuttal report	Table 2: Total number of early voting locations with 24-hour voting in each county in the 2020 general election	FRE 702, 801 et seq.		
HAUL-MFV 352	4/25/2022 Grose rebuttal report	Table 3: Number of early voting locations restricted by SB1 prohibition on Sunday voting before 9 am	FRE 702, 801 et seq.		
HAUL-MFV 353	2/10/2023	Christian Grose Supplemental Expert Report	FRE 702, 801 et seq.		
HAUL-MFV 354	2/10/2023 Grose report	Table (page 5): Average share of the vote-by-mail electorate across Texas counties	FRE 702, 801 et seq.		
HAUL-MFV 355	2/10/2023 Grose report	Table (page 6): Size of eligible Latino population/decline in Latino average share of vote by mail	FRE 702, 801 et seq.		
HAUL-MFV 356		The empirical impact of SB1 on voters of color	FRE 801 et seq.		
HAUL-MFV 357	2022	2022 Hotline Responses excel	FRE 801 et seq.		
HAUL-MFV 358	2022	General Voter Education 2022 (MFV Texas Team)	FRE 801 et seq.		

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HAUL-MFV 359	2/18/2022	Texas Civil Rights Project - SB 1 Summary (external)(rev. 02.18.22)	FRE 801 et seq.		
HAUL-MFV 360	11/21/2021	SB1-Provisions			
HAUL-MFV 361	Dec-21	Texas Civil Rights Project Presentation on VR Changes by James Slattery	FRE 801 et seq.		
HAUL-MFV 362	2022	Mi Familia Vota – Toolkit – Texas Lets Get Ready for Early Vote	FRE 801 et seq.		
HAUL-MFV 363	2022	Training Updated 2022 TX Voter Education Hotline Volunteer Training PowerPoint	FRE 801 et seq.		
HAUL-MFV 364	7/18/2018	Email from Elections Internet To: Redacted Subject: Election Security	FRE 801 et seq.		
HAUL-MFV 365	7/19/2018	Email from Steven Strominger To: Secretary Subject: Election security	FRE 801 et seq.		
HAUL-MFV 366	7/18/2018	Email from Elections Internet To: Redacted Subject: Re: Election Security	FRE 801 et seq.		
HAUL-MFV 367	2/13/2019	Email from Sam Taylor To: Jacqueline Benton Subject: RE: Question regarding Secretary of State's cybersecurity	FRE 801 et seq.		
HAUL-MFV 368	12/3/2020	Email from Elections Internet To: Redacted Subject: FW: Web Mail Correspondence	FRE 801 et seq.		
HAUL-MFV 369	3/21/2017	Email from Evans Carrlyn To: Gneral@gregabbott.com; ken.paxton@oag.texas.gov; Secretary Subject Important correspondence from NAACP President	FRE 801 et seq.		
HAUL-MFV 370	10/4/2020	Email from Heidi Martinez To: Redacted Subject: Integrity of our elections (EI Response)	FRE 801 et seq.		
HAUL-MFV 371	12/30/2019	Email from Heidi Martinez To: Redacted Subject: Ms. Diana Pattillo (EI)	FRE 801 et seq.		
HAUL-MFV 372	8/11/2020	Email from Charles Pinney To: Redacted Subject: Re" Illegal or just inappropriate? (EI Response)	FRE 801 et seq.		

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HAUL-MFV 373	7/26/2019	Email from Stephen Chang To: Phillip Prazan Subject: RE" KXAN media request	FRE 801 et seq.		
HAUL-MFV 374	2/4/2019	Email from Elections Internet To: Christina Adkins Subject: FW: The list of non-citizens	FRE 801 et seq.		
HAUL-MFV 375	2/5/2019	Email from Elections Internet To: Christina Adkins Subject: FW: Vote Fraud Advisory	FRE 801 et seq.		
HAUL-MFV 376	2/13/2019	Email from Elections Internet To: Christina Adkins Subject: FW: Voter fraud list	FRE 801 et seq.		
HAUL-MFV 377	10/25/2022	Email from James Slattery To: James Slattery Subject: FWD: Press Release: Civil Rights Groups Call for federal watchdogs after secretary of State undermines Harris County midterm election	FRE 801 et seq.		
HAUL-MFV 378		Application for a Ballot by Mail – Ingram April 26, 2022, Depo Ex. 6			
HAUL-MFV 379		Carrier Envelope for Early Voting Ballot – Ingram April 26, 2022, Depo Ex. 7 -			
HAUL-MFV 380		Official Election Signature Sheet for an FPCA Voter – Ingram April 26, 2022, Depo Ex. 8			
HAUL-MFV 381		Notice of Rejected Application for Ballot by Mail – Ingram April 26, 2022, Depo Ex. 9			
HAUL-MFV 382		Notice of Rejected Application for Ballot by Mail – Ingram April 26, 2022, Depo Ex. 10			
HAUL-MFV 383		Texas Secretary of State – FAQs on Applications for Ballot by Mail (ABBM)s – Ingram April 26, 2022, Depo Ex. 11			
HAUL-MFV 384	1/28/2022	Election Advisory No. 2022-08 From: Keith Ingram To: Election Officials			
HAUL-MFV 385		Oath of Assistance – Ingram April 28, 2022 Depo Ex. 02			
HAUL-MFV 386		Oath of Assistance and Interpreter Statement of Purpose			

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HAUL-MFV 387		Texas Secretary of State, Elections Division, Webinar			
HAUL-MFV 388	11/30/2020	Secretary Hughs Press Release, Ingram 4/26/2022 Depo. Ex. 22			
HAUL-MFV 389	4/7/2022	Email from Keith Ingram to Justin Williamson re county by county mail ballot numbers, Ingram 5/6/2022 Depo. Ex. 4	FRE 801 et seq.		